

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|------------------------|---|-----------------------|
| In re |) | Chapter 7 |
| |) | |
| Felix & Maria Cardona, |) | Case No. 05-20106 |
| |) | |
| Debtors. |) | Hon. Eugene R. Wedoff |

**First and Final Application for Allowance and Payment of
Compensation and Reimbursement of Expenses
of Joseph A. Baldi & Associates, Attorneys for Trustee**

Joseph A. Baldi & Associates, P.C. ("Baldi & Associates" or "B&A"), attorneys for Joseph A. Baldi, as trustee ("Trustee") of the estate ("Estate") of Felix and Maria Cardona, debtors ("Debtors"), pursuant to section 330 of title 11, United States Code ("Code"), request this Court to enter an order for the allowance and payment to Baldi & Associates of 1) \$6,739.00 as final compensation for 26.70 hours of legal services rendered to the Trustee from October 25, 2005 through the close of this case; and 2) \$26.50 as reimbursement of expenses incurred in connection with such services. In support thereof, Baldi & Associates respectfully states as follows:

Introduction

1. Debtors commenced this case on May 19, 2005 by filing a voluntary petition for relief under chapter 7 of the Code.
2. Joseph A. Baldi is the duly appointed, qualified and acting chapter 7 trustee in this case.
3. As of the commencement of this case, the Estate's primary asset was a fraudulent transfer claim against the Debtors' son for the pre-petition transfer of the Debtors' interest in certain real estate to their son.
4. The bar date for filing claims in this case was January 26, 2006.

Prior Compensation Received

5. This is the first and final application ("Application") for allowance and payment of compensation that Baldi & Associates will file in this case.

Retention of Baldi & Associates

6. On June 22, 2006, the Court entered an order authorizing Trustee to employ Joseph A. Baldi and the law firm of Baldi & Associates as his counsel in this case. Baldi & Associates has served as counsel for Trustee at all times since its retention. A copy of the order authorizing Trustee to retain Baldi & Associates is attached hereto as Exhibit A.

7. The professional qualifications and experience of the Baldi & Associates attorneys and paralegals who have performed substantial legal services for the Trustee during the period covered by this Application is attached hereto as Exhibit B. The attorneys and paralegals who were primarily responsible for representing the Trustee during the period covered by this fee application are:

Joseph A. Baldi -- Partner
Donna B. Wallace -- Associate
Elizabeth C. Berg -- Associate/Paralegal¹

Services Rendered by Baldi & Associates

8. Itemized and detailed descriptions of the specific services rendered by Baldi & Associates to the Trustee for which compensation is sought in this Application are reflected on the billing statements attached hereto as Exhibit C. The billing statements set forth the name of each attorney or paralegal, the amount of time spent rendering each service, the date on which each

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Ms. Berg is both a licensed attorney at law and a certified and duly trained paralegal. She has performed services on behalf of Trustee in this case in both capacities. As previously disclosed in the Trustee's application to employ Baldi & Associates, Ms. Berg bills for her services as an attorney at the rate of \$200/hour and at \$140/hour for paralegal services for the period prior to June 1, 2007 (and at the rate of \$250.00/hour and at \$160/hour for paralegal services for the period after June 1, 2007). Ms. Berg maintains separate timekeeper numbers in order to distinguish her dual capacities and to bill her services at the appropriate rate.

service was rendered, a description of the service rendered and the total number of hours of services rendered by each attorney or paralegal in each category.

9. The services rendered by Baldi & Associates during the period covered by this Application have been summarized in three (3) categories below:

Fraudulent Conveyance Claim: Baldi & Associates investigated the Debtors' interest in the real property commonly known as 2604 West Fullerton Avenue, Chicago, Illinois ("Property"); Baldi & Associates reviewed and analyzed documentation evidencing the transfer of the Debtors' ownership interest in the Property from the Debtors to their son, Felix Cardona, Jr. ("Felix Jr."); Baldi & Associates, as requested by the Trustee, made demand upon Felix Jr. for a recovery of the transferred interest; Baldi & Associates represented the Trustee in extensive negotiations with Felix Jr.; and, ultimately, Baldi & Associates negotiated a settlement whereby Felix Jr. paid the Estate \$42,000 which represents sufficient monies to pay the Estate's administrative and general unsecured claims in full.

In connection with the foregoing, Baldi & Associates spent 20.00 hours for which it requests allowance and payment of final compensation in the amount of \$5,676.00.

General Administration: Baldi & Associates advised the Trustee with respect to the general case administration and his duties under the Bankruptcy Code; Baldi & Associates prepared this final fee application and the Trustee's Final Fee Application.

In connection with the foregoing, Baldi & Associates spent 5.50 hours for which it requests allowance and payment of final compensation in the amount of \$823.00.

Retention of Professionals: Baldi & Associates prepared and presented the Trustee's Motion to Employ Attorneys.

In connection with the foregoing, Baldi & Associates spent 1.20 hours for which it requests allowance and payment of final compensation in the amount of \$240.00.

Compensation Requested

10. Baldi & Associates has expended a total of 26.70 hours for the services described and categorized in paragraph nine above. The total value of and the amount of compensation requested herein for those services is \$6,739.00.

11. All of the services performed by Baldi & Associates were required for proper representation of the Trustee in this case, were authorized by this Court and were performed by Baldi & Associates at the request and direction of the Trustee. Pursuant to Section 330 of the Code and the generally applicable criteria with respect to the nature, extent and value of the services performed, all of Baldi & Associates' services are compensable and the compensation requested herein is fair and reasonable. There has been no duplication of services rendered to the Trustee by Baldi & Associates for which compensation is requested. In those instances where two or more attorneys participated in any matter, such joint participation was necessary due to the complexity of the problems involved.

12. The rates charged by the attorneys and paralegals of Baldi & Associates in this Application are their usual and customary hourly rates charged during the period covered by this Application for work performed for other clients in both bankruptcy and non-bankruptcy matters. A list of each person who performed services for the Trustee and their hourly rate is contained in the billing statements attached hereto as Exhibit C.

Payment of Compensation

13. Baldi & Associates has not entered into any agreement or understanding of any kind, express or implied, with any other entity to share any compensation received or to be received by Baldi & Associates for services rendered to the Trustee in connection with this case.

14. Baldi & Associates has not previously received or been promised any payments for services rendered in this case.

15. The Affidavit of Joseph A Baldi pursuant to Rule 2016 of the Federal Rules of

Bankruptcy Procedure is attached hereto as Exhibit D and made a part hereof.

16. The proposed source for payment of the compensation requested in this Application are the Estate funds in the Trustee's possession, collected by him during his administration of this case.

Expense Reimbursement

17. In connection with the performance of the services included herein, Baldi & Associates has incurred actual and necessary expenses for which he requests reimbursement in the amount of \$26.50. These expenses relate to fees for recording the Notice of Bankruptcy with the Cook County Recorder of Deeds. Itemized descriptions of the expenses are included within the billing statements attached hereto as Exhibit C.

Status of the Case

18. The Trustee has administered all of the assets belonging to this Estate and completed his review and analysis of the claims filed against the Estate.

19. Trustee has completed and filed his Final Report simultaneously herewith. Final Fee Applications for the Trustee and the Trustee's Accountants have also been filed concurrently with this Application.

Financial Condition of the Case

20. Trustee currently has approximately \$42,095.08 on deposit in the Estate's bank accounts. The Chapter 7 administrative expenses that are currently owing and those the Trustee anticipates the Estate will incur prior to the closing of this case include 1) the fees allowed to Trustee in connection with his final fee application, 2) the legal fees and expenses allowed to Joseph A. Baldi & Associates, P.C. in connection with this final fee application, and 3) any fees which may be due or outstanding to the offices of the United States Trustee and the Clerk of the United States Bankruptcy Court.

21. Following payment of all Chapter 7 administrative expenses set forth above, Trustee

this case representing 100% of allowed claims, plus interest.

Trustee's Approval

22. Baldi & Associates certifies that the Trustee has received, reviewed and approved this Application.

WHEREFORE, Baldi & Associates, attorneys for Joseph A. Baldi, as trustee, requests the entry of an order providing the following:

A. Allowing to Baldi & Associates final compensation in the amount of \$6,739.00 for actual and necessary professional services rendered to the Trustee from October 25, 2005 through the closing of this case; and

B. Allowing to Baldi & Associates reimbursement of \$26.50 for expenses incurred in connection with the foregoing services; and

C. For such other and further relief as this Court deems appropriate.

Dated: January 21, 2009

Joseph A. Baldi & Associates, P.C.

Attorneys for Joseph A. Baldi, as trustee of the estate
of Felix and Maria Cardona, debtors

By: /s/
Joseph A. Baldi

Joseph A. Baldi/Atty ID 00100145
Elizabeth C. Berg/Atty ID 6200886
19 South LaSalle St. Suite 1500
Chicago IL 60603
312.726.8150

Retention Order

Exhibit A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|------------------------|---|-----------------------------|
| In re |) | Chapter 7 |
| |) | Case No. 05-20106 |
| Felix & Maria Cardona, |) | Hon. Eugene R. Wedoff |
| |) | Hearing Date: June 22, 2006 |
| Debtor. |) | Time: 9:30 a.m. |

Order Authorizing Trustee to Employ Attorneys

THIS CAUSE comes before this Court on the Trustee's Application to Employ Joseph A. Baldi and the law firm of Joseph A. Baldi & Associates, P.C. as attorneys for Trustee and the affidavit of Joseph A. Baldi in support thereof; and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that Joseph A. Baldi, as trustee of the estate of Felix & Maria Cardona, debtor, is authorized to employ Joseph A. Baldi and the law firm of Joseph A. Baldi & Associates, P.C. to act as counsel for the Trustee, with compensation to be paid in such amounts as may be allowed by this Court upon proper application therefor.

Dated: June 22, 2006

ENTER:


Honorable Eugene R. Wedoff
United States Bankruptcy Judge

Joseph A. Baldi
Attorney ID No. 00100145
Elizabeth C. Berg
Attorney ID No. 6200886
Joseph A. Baldi & Associates, P.C.
19 South LaSalle Street Suite 1500
Chicago, IL 60603
(312) 726-8150

Professional Qualifications

Exhibit B

Baldi & Associates

Joseph A. Baldi

Joseph A. Baldi is the principal shareholder of Baldi & Associates. Prior to establishing his own law firm, Mr. Baldi was a partner in the Chicago law firms of Schwartz & Freeman and Rosenthal and Schanfield, P.C., where he was the Practice Group Chair of the Bankruptcy, Reorganization and Creditors' Rights Practice Group. Mr. Baldi has broad experience in insolvency matters, including bankruptcies, workouts, receiverships and assignments for the benefit of creditors.

Mr. Baldi's extensive experience in the field of bankruptcy includes the representation of creditors, debtors, bankruptcy trustees and creditor committees. Mr. Baldi has represented a variety of lenders, including banks, life insurance companies and other secured creditors in bankruptcy courts throughout the country. Mr. Baldi has represented debtors and bankruptcy trustees in both chapter 7 and chapter 11 cases involving real estate partnerships, restaurants, software vendors, trucking companies, construction firms and gas production facilities.

Mr. Baldi has been a member of the panel of private trustees appointed by the United States Trustee's Office for the Northern District of Illinois since 1988. He has operated numerous businesses as a chapter 11 trustee, including an aluminum manufacturing facility, a steel mini-mill, a retirement home and an industrial real estate partnership. Mr. Baldi has also liquidated a broad range of business entities as a chapter 7 trustee, including law firms, distributorships, retail firms and construction companies.

In addition to his experience in private practice, Mr. Baldi spent five years employed by the United States Trustee's Office in Chicago, Illinois where he supervised some of the largest Chapter 11 cases pending in the Northern District of Illinois. While at the U.S. Trustee's office, Mr. Baldi was responsible for the U.S. Trustee's program which monitors chapter 7 panel trustees.

Mr. Baldi is admitted to practice before the Supreme Court of Illinois, the United States District Courts for the Northern District of Illinois, the Eastern District of Wisconsin, the Northern District of Indiana and the Eastern District of Michigan and the Seventh Circuit Court of Appeals. Mr. Baldi is a member of the Bankruptcy and Reorganizations Committee of the Chicago Bar Association and American Bar Associations, the American Bankruptcy Institute and the National Association of Bankruptcy Trustees. Mr. Baldi has also actively participated in the Mediation and Local Rules subcommittees of the Chicago Bar Association's Bankruptcy and Reorganizations Committee. In addition to his legal pursuits, Mr. Baldi is active in municipal affairs in his hometown of Park Ridge, Illinois as a member of his local elementary school board and a Park Ridge alderman.

Mr. Baldi received his Juris Doctor, *cum laude*, from DePaul University, Chicago, Illinois and received his Bachelor of Arts degree from Western Illinois University in Psychology.

Baldi & Associates

Donna B. Wallace

Donna B. Wallace is an Associate of the firm whose expertise is in representing debtors, creditors and trustees in chapter 7, 11 and 13 proceedings. Prior to attaining her law degree, Mrs. Wallace spent fourteen years in Accounting and Finance with Rockwell International. In her last position with Rockwell, Mrs. Wallace was a Business Segment Controller where she supervised a joint venture with a Japanese Company. After graduating from law school, Mrs. Wallace joined the Bankruptcy Group at Rosenthal and Schanfield; she later joined the firm of Rathje Woodward Dyer and Burt in Wheaton, Illinois where she concentrated in bankruptcy and commercial litigation.

Mrs. Wallace is admitted to practice in the State of Illinois and the United States District Court for the Northern District of Illinois. She is a certified mediator and arbitrator.

Mrs. Wallace received her Juris Doctor, *with highest distinction*, from The John Marshall Law School in Chicago. At John Marshall, she received the Wall Street Journal Business Planning Award, was a member of the Law Review which published her comment on the topic of lenders liability and was elected to the Order of John Marshall. Mrs. Wallace received an undergraduate degree in Economics and a Masters Degree in Business Administration.

Mrs. Wallace has served as a part-time member of the accounting and law faculties at various colleges including College of DuPage, MacCormac College, and Roosevelt University and was Associate Professor of Paralegal Studies at Northwestern Business College prior to joining the firm.

Billing Statements

Exhibit C

Joseph A. Baldi & Associates, P.C.
 19 S. LaSalle Street
 Suite 1500
 Chicago, IL 60603

Phone: (312) 726-8150

Fax: (312) 726-5067

FEIN: 36-4352753

Invoice submitted to:

February 9, 2009

Invoice No: 1186

Baldi & Associates
 Joseph A. Baldi
 19 South LaSalle Street
 Suite 1500
 Chicago, IL 60603

Consolidated Summary

| | Hours | Fees | Expenses | Total Charges | Payments | Previous Balance | Balance Due |
|--|--------------|-----------------|--------------|-----------------|----------|------------------|-------------------|
| Cardona - General Administration | | | | | | | |
| | 5.50 | \$823.00 | \$0.00 | \$823.00 | \$0.00 | \$0.00 | \$823.00 |
| Cardona - Retention of Professionals | | | | | | | |
| | 1.20 | \$240.00 | \$0.00 | \$240.00 | \$0.00 | \$0.00 | \$240.00 |
| Cardona - Fraudulent Conveyance claim | | | | | | | |
| | 20.00 | \$5,676.00 | \$26.50 | \$5,702.50 | \$0.00 | \$0.00 | \$5,702.50 |
| Balance Due | <u>26.70</u> | <u>6,734.00</u> | <u>26.50</u> | <u>6,765.50</u> | | | <u>\$6,765.50</u> |

Joseph A. Baldi & Associates, P. C.

2/09/2009

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Cardona - General Administration

In Reference to: *Cardona - General Administration***Professional Services**

| <u>Date</u> | <u>Staff</u> | <u>Description</u> | <u>Hours</u> | <u>Charges</u> |
|-------------|--------------|---|----------------------|---------------------|
| 12/27/2005 | ECB1 | Review memo from trustee re pending matters | 0.10 \$140.00/ hr | \$14.00 |
| 10/03/2006 | ECB1 | Meet with Trustee and confer on status in connection with 3rd quarterly review for 2006 annual reports | 0.10 \$140.00/ hr | \$14.00 |
| 1/14/2009 | RKP | Edit time detail for preparation of B&A final fee application (.80); draft B&A final fee application (1.50); coversheet (.20); order (.10); affidavit (.20); review and edit fee application (.50); draft Trustee's fee application (1.0); affidavit (.20); order (.20); coversheet (.10); review and edit Trustee fee application (.50). | 5.30 \$150.00/ hr | \$795.00 |
| Total Hours | | | 5.50 | Total Fees \$823.00 |

Joseph A. Baldi & Associates, P. C.

2/09/2009

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Cardona - General Administration

| | |
|-------------------|------------------------|
| Total New Charges | <u>\$823.00</u> |
| Previous Balance | \$0.00 |
| Balance Due | <u><u>\$823.00</u></u> |

Timekeeper Summary

| <u>Name</u> | <u>Hours</u> | <u>Rate</u> |
|----------------------|--------------|-------------|
| Elizabeth (I) C Berg | 0.20 | \$140.00 |
| Ricki K Podorovsky | 5.30 | \$150.00 |

2/09/2009

Cardona - Retention of Professionals

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In Reference to: *Cardona - Retention of Professionals*

Professional Services

| <u>Date</u> | <u>Staff</u> | <u>Description</u> | <u>Hours</u> | <u>Charges</u> |
|-------------|--------------|--|----------------------|---------------------|
| 6/08/2006 | ECB | Prep Motion to Retain Attorneys (.5) Draft order and affidavit for same (.3) | 0.80 \$200.00/ hr | \$160.00 |
| 6/22/2006 | ECB | Appear in court on motion to retain attorneys | 0.40 \$200.00/ hr | \$80.00 |
| | | Total Hours | 1.20 | Total Fees \$240.00 |

Joseph A. Baldi & Associates, P. C.

2/09/2009

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Cardona - Retention of Professionals

| | |
|-------------------|------------------------|
| Total New Charges | <u>\$240.00</u> |
| Previous Balance | \$0.00 |
| Balance Due | <u><u>\$240.00</u></u> |

Timekeeper Summary

| <u>Name</u> | <u>Hours</u> | <u>Rate</u> |
|------------------|--------------|-------------|
| Elizabeth C Berg | 1.20 | \$200.00 |

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Cardona - Fraudulent Conveyance claim

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In Reference to: *Cardona - Fraudulent Conveyance claim*

Professional Services

| <u>Date</u> | <u>Staff</u> | <u>Description</u> | <u>Hours</u> | <u>Charges</u> |
|-------------|--------------|--|----------------------|----------------|
| 3/09/2006 | ECB1 | Review Cook County R/D real estate records (.1) Prepare Notice of Trustee's Interest in real estate (.5) | 0.60 \$160.00/ hr | \$96.00 |
| 3/14/2006 | ECB1 | Proof and revise Notice of Trustee's Interest in Real Estate (.1) Prep recording of same with CCRD (.2) | 0.30 \$160.00/ hr | \$48.00 |
| 6/08/2006 | ECB | Review real estate documents on history of transfer of house for background on estate's interest | 0.30 \$200.00/ hr | \$60.00 |
| 8/24/2006 | ECB1 | Conference. w/ Trustee re status of claim and possibilities of settlement | 0.20 \$160.00/ hr | \$32.00 |
| 2/07/2007 | DBW | review file re real estate transfer to Debtors son and status of settlement negotiations re fraudulent transfer suit (.4). conference with trustee re initiating lawsuit (.2) | 0.60 \$300.00/ hr | \$180.00 |
| 2/07/2007 | JAB | Teleconference to Debtors attorney re settlement of fraudulent transfer to son and payment of negotiated settlement | 0.20 \$350.00/ hr | \$70.00 |
| 4/03/2007 | DBW | review file. retrieve additional documents from recorder of deeds web site. read real estate documents re drafting fraudulent transfer complaint (2.9). check claims register (.2), conference with trustee re extending settlement offer prior to filing complaint (.5) | 3.60 \$250.00/ hr | \$900.00 |
| 4/04/2007 | DBW | review debtors' schedules related to property (.4) draft time line of real estate transactions between debtors and son (.6). begin drafting letter to Debtor's son re recovery of fraudulent transfer (.4) | 1.40 \$300.00/ hr | \$420.00 |
| 4/05/2007 | DBW | complete letter to Debtor's son detailing avoidance action and settlement proposal (1.4), conference with Trustee re letter (.1). revise letter re dates for response and reference to 2002 transfer (.3) | 1.80 \$300.00/ hr | \$540.00 |
| 4/23/2007 | DBW | read letter from Felix Cardona Jr. re purchase of estate's interest (.2), review file re calculation of settlement amount by trustee re responding to letter (.3) | 0.50 \$300.00/ hr | \$150.00 |
| 4/23/2007 | DBW | Teleconference with Inez Cardona re fraudulent transfer to Felix, Jr.. estate's cause of action, formulation of offer (.3). conference with Trustee re same (.2) | 0.50 \$300.00/ hr | \$150.00 |

2/09/2009

Cardona - Fraudulent Conveyance claim

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| | | | | |
|-----------|-----|--|----------------------|----------|
| 4/24/2007 | DBW | respond to letter from Felix Cardona Jr re avoidance action, potential sale of property and breakdown of costs in Trustee's offer (1.0). proofread & revise (.2) | 1.20 \$300.00/ hr | \$360.00 |
| 5/01/2007 | JAB | TC with representative of Cardona re settlement. E-mail to DBW re same. | 0.30 \$400.00/ hr | \$120.00 |
| 5/07/2007 | DBW | Teleconference with Jay Steinberg re possible settlement with Felix Cardona Jr., facts supporting trustee's case | 0.20 \$300.00/ hr | \$60.00 |
| 5/11/2007 | DBW | Teleconference with Jay Steinberg re rejection of settlement offer | 0.10 \$300.00/ hr | \$30.00 |
| 5/14/2007 | DBW | Teleconference with opposing counsel re settlement offer | 0.10 \$300.00/ hr | \$30.00 |
| 5/15/2007 | DBW | meeting with Trustee to review settlement offer from Felix Cardona Jr., formulate counter-offer | 0.20 \$300.00/ hr | \$60.00 |
| 5/16/2007 | DBW | Teleconference with opposing counsel re settlement (.1). conference with Trustee re same (.1) | 0.20 \$300.00/ hr | \$60.00 |
| 5/17/2007 | DBW | prepare tolling agreement (.3). draft e-mail & fax transmitting same to opposing counsel (.1) | 0.40 \$300.00/ hr | \$120.00 |
| 5/18/2007 | DBW | Teleconference with opposing counsel re tolling agreement. settlement | 0.20 \$300.00/ hr | \$60.00 |
| 5/18/2007 | DBW | begin drafting Settlement Agreement) | 0.90 \$300.00/ hr | \$270.00 |
| 5/21/2007 | DBW | complete settlement agreement (.9). proofread and revise (.2) | 1.10 \$300.00/ hr | \$330.00 |
| 5/21/2007 | DBW | Draft Motion to Settle (1.1) and proposed order (.2) | 1.30 \$300.00/ hr | \$390.00 |
| 5/23/2007 | DBW | Conference with Trustee re changes to Settlement Agreement (.2). revise settlement agreement to incorporate waiver of claim to surplus estate (.2). revise Motion re same (.1), draft 2002 notice (.4). draft e-mail to opposing counsel transmitting documents (1). Prepare Release of Trustee's Interest in Real Estate (.3) | 1.30 \$300.00/ hr | \$390.00 |
| 6/20/2007 | DBW | Teleconference with opposing counsel re allowing client claim for payment (.1), conference with Trustee re same (.2) | 0.30 \$300.00/ hr | \$90.00 |
| 6/28/2007 | DBW | Conference with opposing counsel re rejection of revised settlement offer | 0.10 \$300.00/ hr | \$30.00 |

Joseph A. Baldi & Associates, P. C.

2/09/2009

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Cardona - Fraudulent Conveyance claim

| | | | | |
|-------------|-----|--|----------------------|-----------------------|
| 7/13/2007 | DBW | Revise tolling agreement (.1), e-mail to opposing counsel re executed settlement agreement & revised tolling agreement (.2). | 0.30 \$300.00/ hr | \$90.00 |
| 8/15/2007 | DBW | Teleconference with opposing counsel re settlement agreement (.1), revise Motion & pleadings to change dates (.2). e-mail to opposing counsel re same (.1) | 0.40 \$300.00/ hr | \$120.00 |
| 9/04/2007 | DBW | organize exhibits. revise proposed order (.3). e-file (.1) | 0.40 \$300.00/ hr | \$120.00 |
| 9/18/2007 | DBW | Appear in Court re Motion to Approve Cardona Settlement | 0.40 \$300.00/ hr | \$120.00 |
| 9/18/2007 | DBW | Letter to Felix Cardona re approval of settlement agreement & payment | 0.40 \$300.00/ hr | \$120.00 |
| 10/22/2007 | DBW | prepare release of trustee's interest in property | 0.20 \$300.00/ hr | \$60.00 |
| Total Hours | | | 20.00 | Total Fees \$5,676.00 |

Expenses

| <u>Start Date</u> | <u>Code</u> | <u>Description</u> | <u>Quantity</u> | <u>Charges</u> |
|-------------------|-------------|---|------------------------|-------------------|
| 3/14/2006 | FILING | Record Notice of Trustee's Interest in Real Estate with Cook County R/D | 1.00 @ \$26.50/each | \$26.50 |
| Total Expenses | | | | \$26.50 |
| Total New Charges | | | | \$5,702.50 |
| Previous Balance | | | | \$0.00 |
| Balance Due | | | | <u>\$5,702.50</u> |

Timekeeper Summary

| <u>Name</u> | <u>Hours</u> | <u>Rate</u> |
|----------------------|--------------|-------------|
| Donna B Wallace | 14.50 | \$300.00 |
| Donna B Wallace | 3.60 | \$250.00 |
| Elizabeth C Berg | 0.30 | \$200.00 |
| Elizabeth (1) C Berg | 1.10 | \$160.00 |
| Joseph A Baldi | 0.20 | \$350.00 |
| Joseph A Baldi | 0.30 | \$400.00 |

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|--------------------------|---|-----------------------|
| In re |) | Chapter 7 |
| |) | |
| Felix and Maria Cardona, |) | Case No. 05-20106 |
| |) | |
| Debtors. |) | Hon. Eugene R. Wedoff |

Rule 2016 Affidavit

State of Illinois)
County of Cook)

I, Joseph A. Baldi, being first duly sworn upon oath, do depose and state as follows:

1. I am the principal of Joseph A. Baldi & Associates and am authorized to execute this affidavit on behalf of Joseph A. Baldi & Associates.

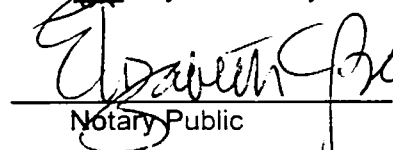
2. I have read the First and Final Application for Allowance and Payment of Compensation and Reimbursement of Expenses of Joseph A. Baldi & Associates, Attorneys for Trustee ("Application") and all of the factual matters set forth therein are true to the best of my knowledge, information and belief. Joseph A. Baldi & Associates has performed the services set forth and described in the Application at the request and pursuant to the direction of the Trustee.

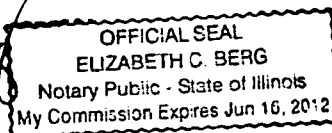
3. A copy of the Application has been provided to Trustee and the Trustee has reviewed and approved the Application.

4. Joseph A. Baldi & Associates has not previously received payment of any compensation for services rendered in connection with this case. Joseph A. Baldi & Associates has not entered into any agreement with any other person or persons for the sharing of compensation received or to be received for services rendered in connection with this matter, except among the principals and associates of Joseph A. Baldi & Associates.

5. Further affiant sayeth naught.

Subscribed and Sworn to before me
this 5 day of January 2009


Notary Public



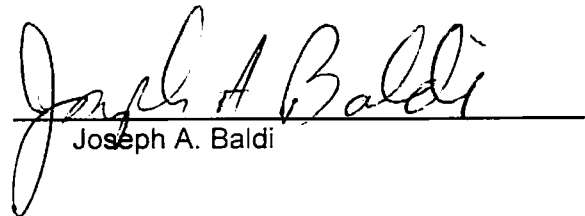

Joseph A. Baldi

Exhibit D